



University of Hawaii at Manoa

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Office of the Director

November 14, 1978

RP:0007

Col. Peter D. Stearns
Department of the Army
Honolulu District
Corps of Engineers
Building 230
Fort Shafter, Hawaii 96858

Dear Col. Stearns:

Public Notice No. PODCO-0 1457-D
Construction of beach park at Ninole Cove,
Ka'u District

The proposed beach construction project at Ninole Cove was submitted for review to the following members of the University: Alison Kay, General Science; Andrew Berger, Zoology; Fris Campbell and Ralph Moberly, Geology and Geophysics; Richard Brock and John Caperon, Hawaii Institute of Marine Biology; Charles Lamoureux, Botany; David Tuggle, Anthropology; Barbara Vogt and Jacquelin Miller, Environmental Center.

The Environmental Center had previously reviewed the Conservation District Use Application for this project at the request of the State Environmental Quality Commission and the Office of Environmental Quality Control. The question at that time was whether the proposed action would involve significant environmental impacts and if the exempt determination was appropriate. In the judgement of our reviewers, the issuance of an exemption for this project was inappropriate under the EIS regulations Section 1:33b.

The action will definitely affect an environmentally sensitive area and certain other potentially significant impacts have not been considered in accordance with Section 1:31a.

The following specific areas of concern have been expressed by our reviewers and should be addressed in, at the least, an expanded Environmental Assessment.

The extensive removal of debris and rubble in the Ninole Cove and adjacent area will affect the benthic communities in the disturbed area. Since there is considerable fresh water entering this area it is likely that the biota is primarily euryhaline in character and as such not commonly seen except in such select areas. A biological survey should be required to determine the significance of the marine and near shore community to be affected.

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The area in the vicinity of Ninole Cove is noted for extensive archeological findings. Since the Ninole springs were undoubtedly a major source of fresh water to the early Hawaiians it is most likely that Ninole Cove also contains archeological remains. We are particularly concerned that significant archeological materials may be present in the offshore area and suggest that an archeological reconnaissance of the area to be dredged should be conducted prior to any excavation of spoil. Has the Bishop Museum been contacted regarding this project? The proposed spoil disposal site shown on sheet 2 of 5 is also of concern from the archeological standpoint. Has this area been previously graded or disturbed? If not, an archeological reconnaissance is in order prior to disposal. In the CDDA permit application we note that in addition to the dredging of the cove, some 60,000 square feet of water front landscaping is proposed. Has this area been surveyed by a qualified archeologist? Are any rare or endangered plants in this area?

Mention is made on sheet 4 that the rocky headlands on each side of the cove are to be extended. The dimensions of these extensions should be indicated either in the text or on the figure.

We should mention that although the use of white sand in a predominately black sand area may be somewhat incompatible aesthetically, we do not foresee the added white sand having a significant impact on the black sand beaches adjacent to Ninole Cove. Sufficient deep water is adjacent to Ninole Cove and we would expect the white sand to be washed out and eventually lost to deeper water rather than being brought up to mix with the black sand beaches.

These are the major points raised by our reviewers. Some more specific questions were listed in our earlier review of the Conservation District Use Application. A copy of this review is attached for your information.

We appreciate the opportunity to comment on this permit request and your consideration of our recommendation that an expanded Environmental Assessment should be prepared and that the exempt determination be withdrawn.

Yours very truly,



Doak C. Cox
Director

DCC:lmk

Attachment

cc: Alison Kay
Andrew Berger
Fris Campbell
Ralph Moberly
Richard Brock
OEQC

John Caperon
Charles Lamoureux
David Tuggle
Barbara Vogt
Jacquelin Miller
EQC